UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE at CHATTANOOGA

1999 JUN 17 P 3: 50
U.S. DISTRICT COURT EASTERN DIST. TENN. BYDEP. CLERK

UNITED STATES OF AMERICA)		BY_ CALDEP. CLERK
)		
vs.)	1:96-CR-41	
)	Judge Collier	
)		
LEONARD WRIGHT)		

MOTION FOR REDUCTION IN SENTENCE

Comes now the United States of America by and through United States Attorney Carl K. Kirkpatrick, and Assistant United States Attorney Paul W. Laymon, Jr., and moves the Court for a reduction in sentence pursuant to Rule 35, Federal Rules of Criminal Procedure.

Defendant pled guilty to conspiracy to distribute cocaine hydrochloride. His codefendant, Odell Tucker, is a fugitive and has not yet been tried. Defendant has assisted the United States in two ways:

- (1) Defendant, since his sentencing, has continued to provide information on the location of Tucker. Tucker is now believed to be hiding in the Bahamas.
- (2) Defendant testified at the Grand Jury in January 1999. Defendant provided detailed information about his sources for cocaine--a certified public accountant in Atlanta and an acquaintance in Miami. Investigation is pending.

Defendant has provided substantial assistance in the investigation or prosecution of other persons who have committed offenses.

Accordingly, the United States moves for a reduction in sentence.

Respectfully submitted,

CARL K. KIRKPATRICK United States Attorney

By

Paul W. Laymon, Jr. Assistant U.S. Attorney 1110 Market St., STE 301 Chattanooga, TN 37402 423/752-5140

CERTIFICATE OF SERVICE

This is to certify that all parties have been properly served with this document

this 16th day of Jun 1

UNITED STATES ATTORNEY

By_

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE AT CHATTANOOGA

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UNITED STATES OF AMERICA)		U.S. DISTRICT COURT EASTERN DIST. TENN.
)	1:96-cr-41	Y CMC DEP. CLERK
v.)	Judge Colli	er
LEONARD WRIGHT)		

GOVERNMENT'S MOTION FOR REDUCTION IN SENTENCE PURSUANT TO RULE 35(b)

Comes the United States of America by Carl K. Kirkpatrick, United States Attorney for the Eastern District of Tennessee, and Assistant United States Attorney Paul W. Laymon, Jr., and conditionally moves the court for a reduction in sentence pursuant to Rule 35(b) of the Federal Rules of Criminal Procedure.

Defendant pled guilty to cocaine offenses. After defendant was sentenced he provided assistance to the United States as to the whereabouts of his codefendant, Odell Tucker, who fled soon after he was indicted by the federal Grand Jury. Based in part on the information provided by defendant, the U.S. Marshal's Service tracked Tucker to the Caribbean. It is expected that Tucker will soon be arrested.

If Tucker is arrested and extradited to the United States, Wright will be a significant witness in any prosecution of Tucker. However, because the United States is not sure when, or if, Tucker will return to the United States, it is conditionally filing this Rule 35 motion before the time runs to file such a motion.

The United States would ask the court to hold the motion pending the possible arrest and extradition of Odell Tucker.

Respectfully submitted,

CARL K. KIRKPATRICK, United States Attorney

Paul W. Laymon, Jr.
Assistant U. S. Attorney
1110 Market Street, Suite 301
Chattanooga, TN 37402
(423) 752-5140

1	IN THE UNITED STATES DISTRICT COURT	FILE	D
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3		U.S. DISTRICT CEASTERN DIST.	
4		DEP DEP	CLERK
5	UNITED STATES OF AMERICA,	C.	CLERK
. 6	Plaintiff,		
	-versus- : 1:96-CR-41		
7	LEONARD WRIGHT,		
8	Defendant. ORIGINA	41	
9	Chattanooga, Tenr	essee	-
10	January 9, 1998		
11	BEFORE: THE HONORABLE CURTIS L. COLLIE	in.	
12	UNITED STATES DISTRICT JUDGE	ik,	
13			
14	APPEARANCES:		
15			
16	FOR THE PLAINTIFF:		
17	PAUL W. LAYMON, JR. Assistant United States Attorney		
18	1110 Market Street, Suite 301 Chattanooga, Tennessee 37402		
19			
20	FOD THE DEFENDANT.		
21	FOR THE DEFENDANT:		
	DAVID M. DUDLEY, Attorney at Law		
22	1801 Century Park East, 24th Floor Los Angeles, California 90067		
23			
24	SENTENCING HEARING		
25			

1	IN THE UNITED STATES DISTRICT COURT
2	EASTERN DISTRICT OF TENNESSEE 1998 MAY 21 P 10: 40
3	AT CHATTANOOGA U.S. DISTRICT COURT EASTERN DIST. JENN.
4	EP CI FPM
5	UNITED STATES OF AMERICA, :
6	Plaintiff, :
	-versus- : 1:96-CR-41
7	LEONARD WRIGHT,
8	Defendant.
9	Chattanaan Manaana
10	Chattanooga, Tennessee September 19, 1997
11	
12	BEFORE: THE HONORABLE CURTIS L. COLLIER, UNITED STATES DISTRICT JUDGE
13	
14	APPEARANCES:
15	
16	FOR THE PLAINTIFF:
17	PAUL W. LAYMON, JR. Assistant United States Attorney
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18	Chattanooga, Tennessee 37402
19	
20	FOR THE DEFENDANT:
21.	DAVID M. DUDLEY,
22	Attorney at Law 1801 Century Park East, 24th Floor
23	Los Angeles, California 90067
24	
25	REARRAIGNMENT